

Kathleen S. Sadowski
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Flagler Beach, FL 32136
Phone: 386-295-3915



November 27, 2025

Office of the Clerk
U.S. Court of Appeals for the Eleventh Circuit
56 Forsyth Street, N.W.
Atlanta, Georgia 30303

Re: Status of Pro Se Amicus Curiae Brief

Bear Warriors United, Inc. v. Secretary, Florida Department of Environmental Protection
Case Nos. 25-11612 & 25-11821; on appeal from No. 6:22-cv-02048-CEM-LHP (M.D. Fla.)

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Dear Clerk of Court:

I am writing as a pro se, non-party landowner whose property lies within the northern Indian River Lagoon / Mosquito Lagoon watershed directly affected by the injunction and septic-system moratorium at issue in the above-captioned appeals. I respectfully request clarification regarding the status of my proposed amicus curiae brief in these consolidated cases.

I previously submitted an amicus curiae brief and related filings by certified mail on three separate occasions, after receiving notices from your office identifying deficiencies and corrections that were needed. I carefully revised my filings each time to comply with the instructions I was given (including formatting, page limits, and any certificates required), and I re-mailed the corrected papers on time, again using certified mail at my own expense.

Despite those efforts and costs, my amicus brief does not appear on the public docket, and I have not received any clear explanation stating whether:

1. My amicus filing has been rejected as non-compliant (and, if so, for what specific reason), or
2. The Court has denied leave to file my amicus brief on substantive grounds, or
3. My most recent corrected submission is still being processed.

Because I am a pro se litigant and not an attorney, I am trying in good faith to follow the Federal Rules of Appellate Procedure and the Eleventh Circuit's local rules, but I cannot correct what I do not understand. At this point I have spent money on three certified mailings and significant time preparing and revising my brief, and I am still unsure why it has not been accepted for filing.

This situation has a real financial and practical impact on me. I am the vested-rights owner of 4.1 acres of AG-1 property located at 1273 Maytown Rd, Oak Hill, Florida, which I purchased in 2023. I began incurring expenses, engineering work, and permit-related costs to place a modular home with an in-law suite on that property before the July 17, 2025 septic-system moratorium took effect. That home was intended to house and care for my 94-year-old mother and my disabled sister, both of whom now require substantial daily care, medical appointments, and accessibility accommodations.

In reliance on being able to build on my property, I worked hard to qualify for a mortgage for the modular home, and I was scheduled to close in September 2025. Because of the uncertainty and restrictions created by the injunction and moratorium, that mortgage and closing have effectively been voided, leaving me unable to proceed with construction. At the same time, I am forced to pay high monthly rent at my current residence in Flagler Beach because I am not allowed to build and live on my own property, even though I am a vested right owner who began the development process before the moratorium.

I have reached out repeatedly to every level of government I can access, including Governor Ron DeSantis, Senator Rick Scott, my state and local representatives, the Florida Department of Environmental Protection (FDEP), and the U.S. Fish and Wildlife Service (FWS). Despite these efforts, no one has been able to offer any meaningful relief or a path forward for me as an affected landowner. As an American citizen and vested-right property owner, this has become a profound burden on my finances, my ability to provide stable housing, and my ongoing care responsibilities for my mother and sister.

Because I cannot move forward with my modular home due to the injunction and moratorium being litigated in these appeals, I sought to participate as an amicus curiae to give the Court a real-world perspective from an affected individual landowner who is not otherwise represented in this case. The continued uncertainty about my amicus status, after multiple corrected submissions, is placing an additional financial burden on me at the same time that I am trying to provide hands-on care to my family.

If there is an appropriate email address or electronic point of contact for pro se correspondence in these appeals, I would be grateful if you could provide that information, so that I may avoid further unnecessary mailing expenses and more effectively communicate with the Court.

Accordingly, I respectfully request:

1. Written clarification of the status of my proposed amicus curiae filing in Case Nos. 25-11612 and 25-11821;
2. If my filing has been rejected for procedural or formatting reasons, a brief description of the specific rule provisions I failed to meet so that I can understand what went wrong; and
3. If the Court has denied leave to file my amicus brief on substantive grounds, confirmation of that decision so that I do not continue to incur further mailing expenses trying to correct a filing that will not be accepted.

I am not asking the Court to relax its rules for me. I am simply asking for enough information to know whether I made a curable technical mistake, or whether the Court has already decided not to accept my amicus participation at all.

Thank you for your time and for any guidance or clarification you can provide to a pro se landowner who is directly affected by these important appeals.

Respectfully submitted,

Kathleen Sadowski

Kathleen S. Sadowski
Pro Se Landowner
Volusia County, Florida

cc: U.S. Senator Rick Scott, Florida
U.S. Senator Ashley Moody, Florida
U.S. Representative Randy Fine, Florida's 6th District
U.S. Representative Cory Mills, Florida's 7th District



**25-11612-GG Bear Warriors United, Inc. v. Secretary, Florida Department of Environmental Protection
"Court Order Filed Denied File Amicus Brief" (6:22-cv-02048-CEM-LHP)**

<ecf_help@ca11.uscourts.gov>

Wed, Nov 26 at 3:54 PM

To: <gavinpski@gmail.com>

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United States Court of Appeals for the Eleventh Circuit

Notice of Docket Activity

The following transaction was filed on 11/26/2025

Case Name: Bear Warriors United, Inc. v. Secretary, Florida Department of Environmental Protection

Case Number: 25-11612

Document(s): <https://ecf.ca11.uscourts.gov/docs1/011014159891?uid=3dad9e5d3a8fd9cb>

Docket Text:

ORDER: Kathleen S. Sadowski's motion for leave to file an amicus brief out of time is DENIED. [70] RJL
 [25-11612, 25-11821]

Notice will be electronically mailed to:

Lesley Blackner
Jessica L. Blome
Karma Barsam Brown
Elizabeth Carter Chandler Clements
Rachael Curran
Caroline Anne Flynn
Jeffrey Matthew Harris
Alyssa Huffman
Jeffrey Jennings
Matthew Z. Leopold
Jaclyn Lopez
Mark Miller
Victoria Molyneaux
Erica Nicole Peterson
Kathleen S. Sadowski
Dylan Soares
Andrew J. Turner
Nicholas Browder Venable
Sierra B. Weaver
Bryan Weir
Ragan Whitlock

The following document(s) are associated with this transaction:

666 Document Description: Court Order Filed

Original Filename: 25-11612.bearwarriors.order+(deny+pro+se+amicus) (1).pdf

Electronic Document Stamp:

[STAMP acecfStamp_ID=1160056652 [Date=11/26/2025] [FileNumber=10612922-0] [3e3024fea647d16a0e522fc8eb16e
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SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Article Addressed to:</p> <p>The Honorable Lee Zeldin 1800 Pennsylvania Avenue Washington, DC 20460</p>		<p>A. Signature</p> <p>X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Transfer from service label)</p> <p>589 0710 5270 2318 6976 72</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p> <p>10/7/2025</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	


PS Form 3811, July 2020 PSN 7530-02-000-9053

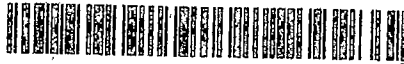
SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Article Addressed to:</p> <p>Matt Tripp Beas Warrior United Oviedo, FL 32762</p>		<p>A. Signature</p> <p>X <i>Dane Shadin</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Transfer from service label)</p> <p>9589 0710 5270 2721 4785 47</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	


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<p>1. Article Addressed to:</p> <p>FDEP 3900 Commonwealth Tallahassee, FL 32399</p>		<p>A. Signature</p> <p>X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Transfer from service label)</p> <p>9589 0710 5270 2318 6977 19</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p> <p>ROSCOE HOLTON</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	

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1. Article Addressed to: Bear Warriors United Matt Tripp 83 Geneva Dr Oviedo, FL 32762		B. Received by (Printed Name) Dane Shadi C. Date of Delivery OCT 08 2025	
2. Article Number (Transfer from service label) 9590 9402 9418 5002 5350 99		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
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PS Form 3811, July 2020 PSN 7530-02-000-9053		Domestic Return Receipt	

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1. Article Addressed to: Stacy L. Watson FDCP 3900 Commonwealth Blvd MS 35 Tallahassee, FL 32399		B. Received by (Printed Name) ROSCOE HOLTON C. Date of Delivery	
2. Article Number (Transfer from service label) 9590 9402 9418 5002 5350 44		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
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PS Form 3811, July 2020 PSN 7530-02-000-9053		Domestic Return Receipt	

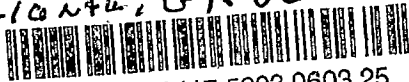
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1. Article Addressed to: Secretary Alexis A. Lambert FDCP Marjory Stoneman Douglas 3900 Commonwealth Blvd Tallahassee, FL 32399		B. Received by (Printed Name) ROSCOE HOLTON C. Date of Delivery	
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1. Article Addressed to:

Clerk of Court
US Court of Appeals
for the 11th Circuit
56 Forsyth St NW
Atlanta, GA 30303



9590 9402 9417 5002 0603 25

2. Article Number (Transfer from service label)

9589 0710 5270 2721 4781 27

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A. Signature

[Signature]

☒ Agent

Date Filed: 10/13/2025

Page: 7 of 8

B. Received by (Printed Name)

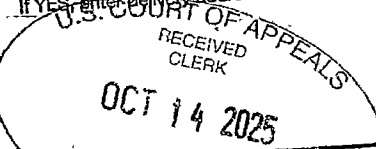
[Signature]

C. Date of Delivery

10/14/25

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No



3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
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A. Signature

[Signature]

☐ Agent

☐ Addressee

B. Received by (Printed Name)

[Signature]

C. Date of Delivery

10-22-25

D. Is delivery address different from item 1? ☐ Yes

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- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
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- ☐ Priority Mail Express®
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- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Kathleen Sadavski
54 Eagle Lake Dr.
Flagler Beach, FL
32136

ORLANDO FL 328

29 NOV 2025 PM 4 L



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